

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. 2:19-cr-00013
v.)
) Chief Judge Crenshaw
)
GEORGIANNA A.M. GIAMPIETRO)

UPDATED NOTICE RE: DISCOVERY

The United States, through the United States Attorney for the Middle District of Tennessee, and pursuant to the earlier directive of the Court, hereby notifies the Court of the discovery that has been provided in this case to date and / or has otherwise been made available to the defendant as of the time of this filing. The government requests leave to supplement and amend as necessary.

Specifically, the government has provided the contents of “Production 1,” “Production 2,” “Production 3,” “Production 4,” and “Production 5,” as further set forth herein.¹

Production 1 – (consists of a single flash drive):

- The contents of GIAMPIETRO’s Facebook accounts, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 3, 2018;
- The contents of GIAMPIETRO’s Instagram accounts, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 3, 2018
- The contents of additional Instagram accounts associated with GIAMPIETRO, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 11, 2018
- The contents of GIAMPIETRO’s Google Cloud account (associated with email

¹ The government anticipates that all of the discovery material produced to date will be subject to the terms of the original protective order entered in this case.

address gergiannagiampieto@gmail.com), obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on March 1, 2019

- The contents of GIAMPIETRO's Samsung S5 cell phone, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of GIAMPIETRO's Samsung S8 cell phone, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of GIAMPIETRO's laptop computer, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of four thumb drives, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- A redacted transcript of an interview of GIAMPIETRO on October 23, 2018, conducted in connection with the execution of a search warrant at her residence on that date

Production 2 – (consisting of six (6) binders, which include eight (8) discs):

- 1 Disc with Content of Tablet (30 GB)
- Search Warrant Affidavit for Facebook accounts is available for inspection and review
- Search Warrant Affidavit for Instagram accounts is available for inspection and review
- Search Warrant Affidavit for Google account is available for inspection and review
- Search Warrant Affidavit for Giampietro's Residence is available for inspection and review
- Subpoena results from social media, telephone, education, financial, and other providers (Binders 1, 2, and 3 that include 7 discs)
- Case Initiation Report

- Report of Online Communications with Giampietro October 2015
- Report of Online Communications with Giampietro November 2016
- Report of Online Activity of Giampietro February 2016
- Report of Online Activity of Giampietro March 2016
- Report of Online Communications with Giampietro June 2016
- Report of Online Communications with Giampietro June 2016
- Report of Online Communications with Giampietro March-April 2017
- Report of Private Chats with Giampietro May 2016
- Report of Text Messages with Giampietro November 2017
- Report of Undercover Meeting with Giampietro November 2017
- Report of Undercover Meeting with Giampietro February 2018 (part 1)
- Report of Undercover Meeting with Giampietro February 2018 (part 2)
- Report of Online Chat with Giampietro September 26, 2018, and associated messages
- Report of Online Chat with Giampietro September 23-24, 2018, and associated messages
- Online Communications with @Alsadaqahsyria October 2018
- Report of Online Chat with Giampietro September 30, 2018, and associated messages
- Report of Online Chat with Giampietro October 1-2, 2018, and associated messages
- Report of Online Chat with Giampietro October 3-4, 2018, and associated messages
- Online Chat with Giampietro October 11, 2018
- Documenting Photographs Obtained During Search of Giampietro's Residence

- Report of Online Communication with Giampietro Between May 3, 2018 and September 12, 2018, and associated messages
- Proffer with Giampietro December 2018
- Report of Interview of Giampietro October 2018 (part 1)
- Report of Interview of Giampietro October 2018 (part 2)
- Journal Excerpt from Evidence Collected at Giampietro's Residence
- Deleted Messages Found on Giampietro's Cell Phone
- Online Post Made by Giampietro Warning Followers Found on Cell Phone
- Open Source Information on Al-Sadaqah
- Text Messages Obtained Between Giampietro and a Chat Group Associate
- Reverse Proffer with Giampietro in April 2019
- Online Warning Found on Giampietro's Cell Phone
- Search Warrant Return from Search of Giampietro's Residence October 2018
- Documents Relating to Physical Surveillance Conducted During the Course of Investigation Documents
- All Physical Evidence Collected from Giampietro's Residence has been made available for inspection and review
- Physical Evidence that Giampietro Gave to the Undercover Employee has been made available for inspection and review
- Audio Recordings of Meetings between Giampietro and the Undercover Employee have been made available for review at the USAO since November 14, 2019
 - Meeting on November 28, 2017
 - Meeting on February 22, 2018
 - Meeting on March 17-18, 2018
 - Meeting on June 25, 2018

Production 3 (consisting of six (6) binders, which include three (3) discs, made available to Defense counsel on December 20, 2019, and produced on December 23, 2019):

- One CD containing approximately eighteen (18) voice messages left by Giampietro
- One Subpoena return for telephone number associated with Giampietro with CD
- One court order return for Facebook social media accounts with CD
- Online chat with Giampietro, Feb 21 - March 20, 2018
- Online chat with Group, March 12-15, 2018
- Online chat with Group, March 22-23, 2018
- Online chat with Group, March 1-2, 2018
- Online chat with Giampietro, Feb 22, 2018
- Online chat with Giampietro, Aug 13-20, 2018
- Text messages with Giampietro, Dec 17, 2017 - Jan 18, 2018
- Online chat with Group, Oct 1, 2018
- Online chat with Group, March 4, 2018
- Online chat with Group, Feb 24-26, 2018
- Online chat with Group, Feb 26-28, 2018
- Online chat with Giampietro, May 16, 2018
- Online chat with Group, March 19-20, 2018
- Online chat with Group, March 2-22, 2018
- Online chat with Group, March 11-12, 2018
- Online chat with Group, March 3 - May 25, 2018

Production 4 (consisting of documents only and entitled Binder 11, which was made available to Defense counsel on January 22, 2020, and received by counsel on January 23, 2020):

- Law Enforcement Letters and corresponding results (totaling approximately 1,000 pages of material) from the following:
 1. Microsoft
 2. Experian
 3. Facebook
 4. Transunion
 5. Equifax
 6. Verizon Wireless
 7. Ben Lomand
 8. AT&T
 9. Myspace
 10. Instagram
 11. Dekalb Telephone
 12. Capitol One
 13. Bank of America

Production 5 (consisting of slightly less than 600 pages of material described below and four (4) discs entitled Binder 12, which has been made available and is to be received by Defense counsel on February 21, 2020):

- Law enforcement information on Georgianna Giampietro online activities and other data September 16, 2015
- Online chats with Giampietro from November 4, 2015
- Voicemail from Giampietro December 14, 2016
- Online chats with Giampietro October 24, 2016, and video attachment
- Property and utility records for home address
- Online chats between September 12, 2018 and October 3, 2018
- Online chats between October 20, 2016 and October 21, 2016
- Online chats October 25, 2016
- Online chats April 2016
- Record of FBI purchase of computer tablet April 30, 2016

- Record of Giampietro's yard sale April 30, 2016
- Online chats from December 7, 2015 to December 9, 2015
- Open source identifying information captured January 21, 2016
- Online chat concerning debt May 25, 2017
- Online chats April 6, 2017 to April 8, 2017, and video attachment
- Online chats May 5, 2017 to May 6, 2017, and voicemail attachment
- Online activities of Giampietro from November and December 2015
- Online chats May 29, 2017 to May 31, 2017
- Online chats February 11, 2017 to February 14, 2017
- Online chats February 4, 2017
- Online chats November 17, 2015 to November 19, 2015
- Online chats November 10, 2016 to November 11, 2016
- Email documenting Giampietro Instagram contact September 22, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2020, I have forwarded a copy of the foregoing document, via the Court's electronic filing system, to Peter J. Strianse, Esq., and Charles D. Swift, Esq., counsel for the defendant.

s/ Philip H. Wehby
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